

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

-----	X	
In re:	:	Chapter 11
	:	
GMS Sunset LLC	:	No. 25-11181
	:	
Debtor.	:	
	:	
-----	X	

**DEBTOR'S RESPONSE TO US TRUSTEE'S MOTION TO CONVERT OR
DISMISS**

GMS Sunset LLC, debtor and debtor-in-possession (the "Debtor"), responds as follows to the US Trustee's Motion to Convert or Dismiss.

1-15. The Debtor admits the allegations of paragraphs 1-15 except that footnote 4 is denied (Mr. Cholakakis is a part owner of both).

16. The Debtor admits the first sentence of paragraph 15, but denies the second sentence.

17-22. The Debtor admits the allegations of paragraphs 17-22.

The Debtor further avers that the delay in filing monthly reports has been due to a medical issue of the Debtor Representative. That has also prevented Mr. Bilidas from communicating more than superficially with counsel regarding this matter. Accordingly, Debtor respectfully requests that the Motion to Convert or Dismiss be denied, or alternatively that it be continued to allow the Debtor to file the missing reports and pay the required fees.

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Counsel for Debtor

Dated: September 26, 2025.

Respectfully submitted,

/s/ Daniel M. Press

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CERTIFICATE OF SERVICE

This is to certify that on this 26th day of September, 2025, I caused the foregoing document to be served by CM/ECF upon the United States Trustee all other parties requesting such notice.

/s/ Daniel M. Press

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